

# **EXHIBIT A**

**Exhibit A**

**Request for Production No. 6:**

All documents and communications concerning Related Litigations, including all pleadings, documents referred to in all docket entries, discovery responses, infringement contentions, and invalidity contentions associated with each Related Litigation.

**Express Mobile's Response to Request for Production No. 6:**

Express Mobile incorporates the General Objections set forth above as if fully herein.

Express Mobile objects to this request as overly broad and unduly burdensome, not proportional to the needs of the case, and as seeking information not relevant to any claim or defense raised in this lawsuit to the extent that it seeks "all documents and communications concerning Related Litigations".

Express Mobile objects to this request as seeking information not relevant to any claim or defense raised in this lawsuit because it is directed to Related Litigations.

Express Mobile objects to this request to the extent that it seeks information or documents that Express Mobile is not allowed to disclose pursuant to either a court order or pursuant to confidentiality obligations or agreements with third parties.

Express Mobile objects to this request as seeking documents that are publicly available and/or are as accessible to Defendants as they are to Express Mobile.

Express Mobile objects to this request to the extent it seeks information that is protected from disclosure by the attorney-client privilege, work product doctrine, or any other applicable privilege, protection, or immunity.

To the extent Express Mobile understands this request and to the extent documents exist, are located after a reasonable search, are not subject to a protective order or an obligation of confidentiality to a third party, and are in Express Mobile's possession, custody, or control, Express Mobile will produce non-privileged interrogatory responses, expert reports, and invalidity contentions served or filed relating to the Asserted Patents in Related Litigations.

**Request for Production No. 8:**

All documents and communications relating to the negotiation of any licenses, agreements, and/or covenants not to sue that list, cover, recite, or otherwise relate to the Asserted Patents or Related Patents.

**Express Mobile's Response to Request for Production No. 8:**

Express Mobile incorporates the General Objections set forth above as if fully herein.

**Exhibit A**

Express Mobile objects to this request as overly broad and unduly burdensome, not proportional to the needs of the case, and as seeking information not relevant to any claim or defense raised in this lawsuit to the extent that it seeks “all documents and communications”.

Express Mobile objects to this request as overly broad and unduly burdensome, and as seeking information not relevant to any claim or defense raised in this lawsuit to the extent that it is directed to Related Patents.

Express Mobile objects to this request to the extent that it seeks information or documents that Express Mobile is not allowed to disclose pursuant to either a court order or pursuant to confidentiality obligations or agreements with third parties.

Express Mobile objects to this request to the extent it seeks information that is protected from disclosure by the attorney-client privilege, work product doctrine, or any other applicable privilege, protection, or immunity.

Express Mobile objects to this request as duplicative of request no. 7.

To the extent Express Mobile understands this request and to the extent documents exist, are located after a reasonable search, are not subject to a protective order or an obligation of confidentiality to a third party, and are in Express Mobile’s possession, custody, or control, Express Mobile will produce non-privileged agreements relating to the Asserted Patents.

**Request for Production No. 9:**

All documents and communications relating to the negotiation of any licenses, agreements, and/or covenants not to sue that list, cover, recite, or otherwise relate to any Related Patents or any Related Applications.

**Express Mobile’s Response to Request for Production No. 9:**

Express Mobile incorporates the General Objections set forth above as if fully herein.

Express Mobile objects to this request as overly broad and unduly burdensome, not proportional to the needs of the case, and as seeking information not relevant to any claim or defense raised in this lawsuit to the extent that it seeks “all documents and communications”.

Express Mobile objects to this request as overly broad and unduly burdensome, and as seeking information not relevant to any claim or defense raised in this lawsuit to the extent that it is directed to Related Patents and Related Applications.

Express Mobile objects to this request to the extent that it seeks information or documents that Express Mobile is not allowed to disclose pursuant to either a court order or pursuant to confidentiality obligations or agreements with third parties.

**Exhibit A**

Express Mobile objects to this request to the extent it seeks information that is protected from disclosure by the attorney-client privilege, work product doctrine, or any other applicable privilege, protection, or immunity.

Express Mobile objects to this request as duplicative of request no. 8.

To the extent Express Mobile understands this request and to the extent documents exist, are located after a reasonable search, are not subject to a protective order or an obligation of confidentiality to a third party, and are in Express Mobile's possession, custody, or control, Express Mobile will produce non-privileged agreements relating to the Asserted Patents.